

OSBORN LAW P.C.

Daniel A. Osborn, Esq.
Lindsay M. Trust, Esq.

43 West 43rd Street, Suite 131
New York, New York 10036
Phone: 212-725-9800
Facsimile: 212-500-5115

Email: info@osbornlawpc.com
www.osbornlawpc.com

MEMORANDUM ENDORSED

December 28, 2022

VIA ECF

Honorable Gabriel W. Gorenstein
United States Magistrate Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *Mendez v. Commissioner of Social Security*,
Civil Action 1:22-cv-05992-GWG

Dear Judge Gorenstein,

We write on behalf of plaintiff, Yanira Mendez, and with the consent of the defendant, to request a 30-day extension of time to file plaintiff's motion for judgment on the pleadings, which is currently due on December 30, 2022. This is plaintiff's first request for an extension of time.

The additional time is necessary because our office has several closely scheduled deadlines in social security matters and counsel was out of the office for the holidays.

Subject to the approval of the Court, the parties propose the following revised briefing schedule:

- a. Plaintiff to file her motion for judgment on the pleadings on or before **January 30, 2023**;

Honorable Gabriel W. Gorenstein
December 28, 2022
Page 2

- b. Defendant to file its response to plaintiff's motion/cross motion on or before **March 31, 2023**; and
- c. Plaintiff to file her reply, if any, on or before **April 21, 2023**.

Thank you for your consideration of this request.


Respectfully submitted,

s/Daniel A. Osborn
Daniel A. Osborn
OSBORN LAW, P.C.
43 West 43rd Street, Suite 131
New York, New York 10036
Telephone: 212-725-9800
Facsimile: 212-500-5115
dosborn@osbornlawpc.com

cc: Padma Ghatage, Esq. (by ECF)

The proposed schedule is approved.

So Ordered.



GABRIEL W. GORENSTEIN
United States Magistrate Judge
December 29, 2022